

Appendix A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
\_\_\_\_\_ DIVISION

Robney A. Simmons

versus

Texas Energy Services  
3000 S. Hwy 281,  
Alice, Texas 79333

§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. \_\_\_\_\_

**V-11-20**

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section §2000e-5.

2. The plaintiff is:

Robney A. Simmons

Address:

1207 Lavender St.

Victoria, Texas 77901

County of Residence: Victoria

3. The defendant is:

Texas Energy Services Inc.

Address:

3000 S. Hwy 281

Alice, Texas 79333



Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on 4/5/10 with the Equal Employment Opportunity Commission.

5. On the date of 3/7/11, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☒ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☐ religion
- (e) ☐ national origin,

the defendant has:

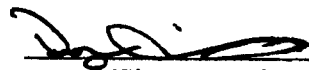
- (a) ☐ failed to employ the plaintiff
- (b) ☒ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff
- (d) ☐ other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. When and how the defendant has discriminated against the plaintiff:

I was scream at and call racial  
names, because I refuse to break the  
law.

8. The plaintiff requests that the defendant be ordered: to pay damages  
in all areas.

- (a) ☐ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☐ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff
- (e) ☐ to pay all damages in all  
areas.
- (f) ☒                      and that;  
the Court grant other relief, including injunctions, damages, costs and attorney's fees.

  
(Signature of Plaintiff)

Address: 1207 Lawndale St.  
Victoria Texas 77901

Telephone: 361-652-2309